UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

ELEV8 BALTIMORE, INC., et al., Plaintiffs,

v.

CORPORATION FOR NATIONAL AND COMMUNITY SERVICE, *operating as* AMERICORPS, *et al.*,

Defendants.

Civil Action No. 1:25-cv-01458 (MJM)

PLAINTIFFS' MOTION TO PERMIT DOE PLAINTIFFS TO PROCEED UNDER PSEUDONYMS, AND TO OMIT DOE PLAINTIFFS' ADDRESSES FROM CAPTION

J. Doe 1, 2, and 3 ("Doe Plaintiffs"), who are former AmeriCorps Participants, respectfully move to proceed under pseudonyms and omit their addresses from the case caption because the release of this information expose them to a significant risk of harm, and because proceeding anonymously will not significantly burden the Defendants or other parties.

WHEREFORE, Plaintiffs request that the Court receive the attached memorandum of law and allow Doe Plaintiffs to proceed under pseudonyms and omit their addresses from the caption, as set forth in the attached proposed Order.

Dated: May 7, 2025 Respectfully submitted,

/s/ Norman L. Eisen

Joshua Kolb*

Norman L. Eisen [Bar No. 09460] Tianna J. Mays [Bar No. 21597] Pooja Chaudhuri* Sofia Fernandez Gold*

DEMOCRACY DEFENDERS FUND

600 Pennsylvania Ave. SE Suite 15180 Washington, DC 20003 Tel: (202) 594-9958

Norman@statedemocracydefenders.org Tianna@statedemocracydefenders.org Pooja@statedemocracydefenders.org Sofia@statedemocracydefenders.org Joshua@statedemocracydefenders.org Attorneys for All Plaintiffs

/s/ Teague P. Paterson

CIO

Teague P. Paterson*
Matthew S. Blumin*
Georgina C. Yeomans*
AMERICAN FEDERATION OF
STATE, COUNTY, AND
MUNICIPAL EMPLOYEES, AFL-

1625 L. Street NW
Washington, DC 20036
Tel: (202) 775-5900
Fax: (202) 429-1293
TPaterson@afscme.org
MBlumin@afscme.org
GYeomans@afscme.org
Attorneys for AMERICORPS
EMPLOYEES UNION, Local 2027 of
the American Federation of State,
County, and Municipal Employees,
AFL-CIO

/s/ Abbe David Lowell

Abbe David Lowell [Bar No. 11863] Brenna L. Frey*

LOWELL & ASSOCIATES, PLLC

1250 H St. NW Second Floor Washington, D.C. 20005 (202) 964-6110

ALowellpublicoutreach@lowellandassociates.com BFrey@lowellandassociates.com Attorneys for All Plaintiffs

<u>/s/ Elena S. Goldstein</u>

Elena S. Goldstein* Skye Perryman*

DEMOCRACY FORWARD FOUNDATION

P.O. Box 34553 Washington, D.C. 20043 Tel: (202) 448-9090

Fax: (202) 796-4426 egoldstein@democracyforward.org sperryman@democracyforward.org Attorneys for All Plaintiffs

^{*} Application for admission or admission pro hac vice forthcoming.